

DENTONS US LLP

Arthur H. Ruegger
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Presentment Date: December 27, 2019 12:00 PM

Objection Date: December 17, 2019

Attorneys for Defendants

Neil Reger Profit Sharing Keogh and Neil Reger

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
SECURITIES INVESTOR PROTECTION :
CORPORATION, :

Plaintiff-Applicant, :

- against - :

BERNARD L. MADOFF INVESTMENT :
SECURITIES LLC, :

Defendant. :

-----X
IRVING H. PICARD, Trustee for the Liquidation :
of Bernard L. Madoff Investment Securities LLC, :

Plaintiff, :

- against - :

NEIL REGER PROFIT SHARING KEOGH and :
NEIL REGER, individually and in his capacity as :
sole trustee of the Neil Reger Profit Sharing Keogh, :

Defendants. :

-----X

Adv. Pro. No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05384 (BRL)

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Arthur H. Ruegger in Support of Application to Withdraw as Counsel, dated December 3, 2019, Dentons US LLP, attorney of record for Defendants Neil Reger Profit Sharing Keogh and Neil Reger (the “Defendants”), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on December 27, 2019, at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: December 3, 2019
New York, New York

DENTONS US LLP

/s/ Arthur H. Ruegger
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*Attorneys for Defendants
Neil Reger Profit Sharing Keogh and Neil Reger*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff-Applicant, :

- against - :

BERNARD L. MADOFF INVESTMENT :
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(Substantively Consolidated)

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IRVING H. PICARD, Trustee for the Liquidation :
of Bernard L. Madoff Investment Securities LLC, :

Plaintiff, :

- against - :

NEIL REGER PROFIT SHARING KEOGH and :
NEIL REGER, individually and in his capacity as :
sole trustee of the Neil Reger Profit Sharing Keogh, :

Defendants. :

Adv. Pro. No. 10-05384 (BRL)

ORDER GRANTING APPLICATION TO WITHDRAW AS COUNSEL

Upon consideration of the application of Dentons US LLP (the “Application”), for an order pursuant to Local Rule 2090-1(e) to withdraw as counsel of record for Neil Reger Profit Sharing Keogh and Neil Reger, (the “Defendants”); and due and sufficient notice of the Application having been given; and the Court having reviewed all pleadings and other papers filed in connection with the Application; and based upon the record of the case; and the Court having determined that the relief requested in the Application is in the best interests of the Defendants; and good and sufficient appearing therefor; it is hereby

ORDERED that Dentons US LLP is granted leave to withdraw as counsel for the Defendants and is hereby removed as counsel for the Defendants in this proceeding.

Dated: _____
New York, New York

Hon. Stuart M. Bernstein
UNITED STATES BANKRUPTCY JUDGE

DENTONS US LLP

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Carole Neville

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Attorneys for Defendants

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SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff-Applicant,	:
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- against -	:
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BERNARD L. MADOFF INVESTMENT	:
SECURITIES LLC,	:
	:
Defendant.	:
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IRVING H. PICARD, Trustee for the Liquidation	:
of Bernard L. Madoff Investment Securities LLC,	:
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Plaintiff,	:
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- against -	:
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NEIL REGER PROFIT SHARING KEOGH and	:
NEIL REGER, individually and in his capacity as	:
sole trustee of the Neil Reger Profit Sharing Keogh,	:
	:
Defendants.	:
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Adv. Pro. No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05384 (BRL)

CERTIFICATE OF SERVICE

I, Arthur H. Ruegger, hereby certify that on December 3, 2019 I caused a true and correct copy of the following documents:

- Notice of Presentment of an Order Granting Application to Withdraw as Counsel;
- Declaration of Arthur H. Ruegger in Support of Application to Withdraw as Counsel; and
- Proposed Order,

to be filed electronically with the Court and served upon the parties in this action who receive electronic service through CM/ECF, and served as indicated below:

By electronic mail and USPS First Class Mail upon:

Neil Reger
4476 Bocaire Blvd.
Boca Raton, FL 33487
neilreger@aol.com

and

David W. Jamison, Jr., Esq.
14550 Peace River Way
Palm Beach Gardens, FL 33418-8680
davidwjamisonjrpa@gmail.com

By electronic mail upon:

David J. Sheehan, Esq.
Elyssa S. Kates, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
dsheehan@bakerlaw.com
ekates@bakerlaw.com

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: December 3, 2019
New York, New York

/s/ Arthur H. Ruegger
Arthur H. Ruegger